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September 4, 2018

VIA ECF

Honorable Steven C. Mannion, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Edward Tobin v. Samsung Electronics America, Inc.
Civil Action No. 18-cv-12473 (JLL) (SCM)

Dear Magistrate Judge Mannion:

This firm represents Defendant Samsung Electronics America, Inc. ("Defendant") in the above-referenced action. I enclose herewith a proposed Stipulation and Consent Order extending the time for Defendant to Answer or Otherwise Respond to Plaintiff's Complaint for thirty (30) days until October 4, 2018. Plaintiff's counsel has consented to the form and entry of this proposed Stipulation and Consent Order.

Thank you for Your Honor's time and attention to this matter. Please do not hesitate to have the Court's staff contact me with any questions of if we may be of any service to the Court whatsoever.

Respectfully submitted,

s/ Michael R. McDonald

Michael R. McDonald

cc: Andrew Obergfell, Esq. (*via ECF*)